

REMARKS

Claims 1-20 are pending in this application. By this Amendment, claims 1-2, 9, 14, 18 and 20 are amended. No new matter is added.

The courtesies extended to Applicants' representative by Examiners Tyler and Werner at the interview held April 23, 2007, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview.

I. Information Disclosure Statement

Applicants note that pages 2 and 3 of the May 12, 2004 PTO-1449 form have not been initialed to indicate that the cited references have been considered. Applicants request that the Examiner consider the references cited on pages 2 and 3 of the May 12, 2004 PTO-1449 form and forward a copy of the May 12, 2004 PTO-1449 form to Applicants with the references cited on pages 2 and 3 initialed as considered.

II. Objection To The Specification

The Office Action objects to the specification. By this Amendment, paragraph [0002] is amended to replace the Attorney Docket numbers with the corresponding application serial numbers.

Applicants request withdrawal of the objection.

III. Claim Objection

The Office Action objects to claims 2 and 14 under 37 C.F.R. 1.75(a).

By this Amendment, claims 2 and 14 are amended to correct the issues raised by the Office Action.

Applicants request withdrawal of the objection.

IV. Claim Rejection under 35 U.S.C. § 101

The Office Action rejects claim 20 under 35 U.S.C. § 101. By this Amendment, claim 20 is amended as suggested in the Office Action to include "computer-readable". Further, without conceding the propriety of the rejection, claim 20 is amended to recite that the medium is tangible.

Applicants respectfully request withdrawal of the rejection.

V. Claim Rejections under 35 U.S.C. §102 and §103

The Office Action rejects claims 1-2, 5, 8-10, 13, 15-18¹ and 20 under 35 U.S.C. §102(b) over U.S. Patent No. 5,343,309 to Roetling; (ii) rejects claims 3-4, 6 and 11-12 under 35 U.S.C. §103(a) over Roetling in view of U.S. Patent No. 5,822,467 to Lopez et al. (Lopez); and (iii) rejects claims 7 and 14 under 35 U.S.C. §103(a) over Roetling in view of U.S. Patent No. 6,538,771 to Sakatani et al. (Sakatani). Applicants respectfully traverse the rejections.

Roetling is directed to adaptive filtering to provide improved reconstruction of a continuous tone (contone) image from a halftone image. The halftone pattern frequency can be determined by various methods or can be estimated (col. 5, lines 16-28). A halftone image is subjected to lowpass spatial filtering to remove the fundamental and harmonic frequencies (col. 5, lines 37-47) to produce a first approximation image (FAI) (col. 6, lines 29-31). Next, the FAI is processed by an adaptive filter at block 36 (Fig. 2; col. 6, lines 39-40). The adaptive filter provides one or more sets of predetermined filters, the particular filter used for each processed pixel being selected under feedback control "based on the content of the FAI in the block 34" (col. 6, lines 40-45).

¹ Claim 18 is not identified in the rejection heading, but is rejected in the body of the rejection.

Thus, regarding independent claims 1, 9, 18 and 20, Roetling fails to disclose "selecting one or more filters from a filter bank based directly on the estimated screen frequency and one or more limit parameters." Roetling fails to disclose this feature because the FAI has the fundamental frequency and harmonics of the halftone pattern removed by the lowpass filter (col. 5, lines 40-42; col. 6, lines 36-38). Thus, because Roetling discloses selecting filters based on the gradient exhibited by the FAI, Roetling's selection process is not directly based on an estimated screen frequency. Lopez and Sakatani do not overcome these deficiencies of Roetling.

For the foregoing reasons, Applicants respectfully request withdrawal of the rejections.

VI. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the application are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,


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